

# Exhibit K

# JONES DAY

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December 1, 2022

VIA E-MAIL

Jasleen Singh  
Counsel  
Brennan Center for Justice at NYU School of Law  
120 Broadway, Suite 1750  
New York, NY 10271

Re: LUPE v. Abbott, No. 5:21-cv-00844-XR (W.D. Tex.)

Counsel:

Along with this letter, Intervenor-Defendants are making a production of documents in response to Plaintiffs' First Set of Requests for Production. The production volume, RPCI001, contains documents Bates-numbered RPCI\_0000001 – RPCI\_0000337. You will receive separate correspondence from Brian Leatherman in our office with an FTP link to access the documents. The password for the underlying 7-zip file is **P5H2Wx7nesQ5J5mTEc2k**. This production is subject to the Court's Stipulated Confidentiality and Protective Order (Dkt. No. 237) and Order Regarding Discovery of Electronically Stored Information (Dkt. No. 251), and Intervenor-Defendants request that the documents in this production be treated as CONFIDENTIAL.

This production is made pursuant to the Court's order as stated in open court during the November 14, 2022 hearing, which required production of all documents responsive to Requests for Production No. 1 and No. 3. Intervenor-Defendants searched the previously disclosed custodians' committee email accounts for any communications with (*i.e.*, To, From, CC, or BCC) email accounts containing \*texas.gov and reviewed the search results for documents and communications regarding SB 1, SB 7, HB 3, or HB 6. All of the documents in the production were collected from Harris County Republican Party custodians. No documents responsive to Requests for Production No. 1 or No. 3 were identified in the possession of the previously identified custodians from the Republican National Committee, National Republican Senatorial Committee, National Republican Congressional Committee, or the Dallas County Republican Party.

Intervenor-Defendants also searched the previously identified custodians' committee email accounts for communications with (*i.e.*, To, From, CC, or BCC) email accounts containing either (i) \*harriscountytx.gov or (ii) \*dallascounty.org and reviewed the search results for documents and communications regarding SB 1, SB 7, HB 3, or HB 6. Intervenor-Defendants conducted this

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search and review pursuant to Request for Production No. 5, as narrowed in scope per the Court's order to SB 1 and the predecessor bills. This search and review yielded no responsive documents.

Please let us know if you need anything further.

Sincerely,

*John M. Gore*  
John M. Gore

cc: All counsel of record (via email only)